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Michael J. Shortley III
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RochesterTel

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: CC Docket No. 92-275

Dear Ms. Searcy:

Enclosed for filing please find an original plus nine (9) copies of the Comments of Rochester Telephone Corporation in this proceeding.

To acknowledge receipt, please affix an appropriate notation to the copy of this letter provided herewith for that purpose and return same to the undersigned in the enclosed

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FEDERAL COMMUNICATIONS COMMISSION
Before OFFICE OF THE SECRETARY
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of

Rochester endorses the Commission's proposals. By streamlining its reporting requirements, the Commission will help to conserve the resources both of its Staff and of the price cap carriers.^{3/} Moreover, the Commission will not sacrifice the quality of the data that it requires to determine if price cap carriers are meeting customer demand by introducing new services. As the Commission correctly notes, quarterly reports -- especially in the initial period following the introduction of a new service -- are of limited utility.^{4/} Demand for a particular new service is likely to build gradually. Quarterly reports may, therefore, not provide an accurate estimate of the utility of a particular new service.

In this regard, however, Rochester notes that the failure of a new service to attract significant demand, even over a longer reporting period, does not provide evidence that price cap carriers have not responded to requests from their customers. For example, Rochester has responded to its customers' requests by introducing certain new services, only later to find that demand for those services did not materialize. For this reason, as well, it would be unfair for the Commission categorically to conclude that price cap

^{3/} Id., ¶ 4.

^{4/} Id.

carriers' initial demand forecasts were inaccurate, at the time that they were submitted, because subsequent events did not bear those forecasts out.

On the foregoing basis, the Commission should adopt the proposals set forth in the Notice.

Respectfully submitted,

Josephine S. Trubek/lltZ
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General Counsel

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March 26, 1993

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